

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MAI-AJAH KEEL,

Plaintiff,

v.

DELAWARE STATE UNIVERSITY
BOARD OF TRUSTEES; CANDY
YOUNG, in her individual capacity; PAULA
DUFFY, in her individual capacity; and
RANDOLPH JOHNSON, in his individual
capacity,

Defendants.

Case No. 1:17-cv-01818-VAC-CJB

DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S COMPLAINT

Defendants Delaware State University Board of Trustees, Candy Young, Paula Duffy and Randolph Johnson, by and through their undersigned counsel, respectfully move this Court under Rule 12(b)(6) of the Federal Rules of Civil Procedure for an Order dismissing Plaintiff's Complaint.

The grounds for this Motion are set forth in the Defendants' Opening Brief in Support, which is being filed contemporaneously herewith.

Respectfully submitted,

SAUL EWING ARNSTEIN & LEHR LLP

/s/ James D. Taylor, Jr.

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University Board of Trustees, Candy Young,
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Dated: February 20, 2018